

EXHIBIT D

Scott Miller

From: Kristen H. Cramer
Sent: Thursday, September 27, 2007 3:02 PM
To: 'poppiti@blankrome.com'; 'levan@blankrome.com'
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Subject: LG.Philips LCD Co., Ltd. v. Tatung Company, et al., C.A. No 0.04 - 343-JJF

Dear Special Master Poppiti:

Pursuant to the discussions of last week and our correspondence of yesterday, the parties have been exchanging proposals for modified cut-off dates and the scheduling of expert depositions. At present, the status of those discussions is as follows:

MODIFIED DATES

We believe the parties have agreed to the following new dates (with LPL reserving all rights with respect to the Special Master's decision on the continued deposition):

Matter	Current Date	Proposed Dates
LPL 30(b)(6) Deposition	9/19/07-9/21/07	10/10/07-10/12/07
L/D for Defendants to serve Supplemental Expert Report	10/01/07	10/22/07
L/D to serve Rebuttal expert reports and reports on issues which the party does not bear the burden of proof	10/11/07	10/29/07
L/D to complete expert depositions	10/26/07	11/08/07
L/D to file Case Dispositive Motions to Special Master	11/02/07	11/15/07
Oppositions to MSJs	11/29/07	12/03/07
Replies to Oppositions to MSJs	12/10/07	12/14/07
Hearing on MSJs	12/20/07 or 12/28/07 tbd by SM	12/28/07
Initial Special Master's Report and Recommendations on Case Dispositive Motions	1/03/08 or 1/11/08	1/11/08
L/D to file Exceptions to the Special Master's Report and Recommendations on Case Dispositive Motions	1/11/08 or 1/18/08	1/18/08
L/D to file Responses to Exceptions to the Special Master's Report and Recommendations on Case Dispositive Motions	Five business days after Exceptions	1/25/08
L/D to file Joint Proposed Pretrial Order	2/04/08	2/04/08
Pretrial Conference @ USDC - Delaware 1:00 pm	2/07/08	2/07/08

10/4/2007

Trial @ USDC - Delaware 9:30 am Court room 4B	3/10/08	3/10/08
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The parties respectfully request that the above listed dates be considered by the Special Master for submission to the Court.

EXPERT DEPOSITION SCHEDULE:

The parties are continuing to work on finalizing the expert deposition schedule.

Defendants current proposal is:

October 30, 2007 - LPL's damages expert, Mr. Cobb (by one defendant)

October 31, 2007 - LPL's damages expert, Mr. Cobb (by other defendant)

November 1, 2007 - Defendant's damages expert

November 2, 2007 - Other Defendant's damages expert

November 3, 2007 - Defendant's non-infringement expert

November 4, 2007 - Other Defendant's non-infringement expert

November 5, 2007 - LPL's infringement expert, Dr. Bohannon (by one defendant)

November 6, 2007 - LPL's infringement expert, Dr. Bohannon (by other defendant)

November 7, 2007 - LPL's validity expert

November 8, 2007 - Defendants' invalidity expert, Dr. Silzars

LPL's most recent proposal differs from the above in that it allows only 1 day for deposition of LPL's damages expert for both defendants combined, allows only 1 day for LPL to depose one or both of the defendants damages expert(s), and proposes to have a deposition of LPL's inequitable conduct expert on November 9.

The parties expect they can work out the differences between their respective positions regarding the expert deposition scheduling by early next week, and request that they be permitted to continue to do so.

Respectfully submitted,

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10/4/2007